

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

BETHANY R. SCAER and
STEPHEN SCAER

Plaintiff,

v.

CITY OF NASHUA, a municipal
corporation; JAMES W. DONCHESS,
Mayor, City of Nashua, in his official and
individual capacities; JENNIFER L.
DESHAIES, Risk Manager, City of
Nashua, in her official and individual
capacities,

Defendants.

Civil Action No. 1:24-cv-00277-LM-TSM

**ASSENTED – TO MOTION TO EXTEND DEFENDANTS’ DEADLINES TO
RESPOND TO PENDING PLEADINGS**

Defendant Jennifer L. Deshaies, by her attorneys, Preti Flaherty, PLLP, pursuant to LR 7.2(a), respectfully submits the within Assented – to Motion to extend the Defendants’ deadlines to respond to Plaintiffs’ Motion for Preliminary Injunction and Plaintiffs’ Complaint, and in support thereof, represents as follows:

1. Plaintiffs filed their Complaint and Motion for Preliminary Injunction in this matter on September 6, 2024. Defendant City of Nashua was served on or about September 9, 2024, and Defendants James Donchess and Jennifer Deshaies were served on or about September 10, 2024. Accordingly, the deadlines for Defendants to (1) respond to Plaintiffs’ Motion for Preliminary Injunction are September 23 (Defendant City of Nashua) and September 24 (Defendants Donchess and Deshaies); and (2) respond to Plaintiffs’ Complaint are September 30 (Defendant City of Nashua) and October 1 (Defendants Donchess and Deshaies).

2. Defendants need additional time to prepare their responses to the Motion for Preliminary Injunction and to the Plaintiffs' Complaint and accordingly request a brief extension of the deadlines, as follows:

Defendants' Responses to Plaintiffs' Motion October 10, 2024
for Preliminary Injunction:

Defendants' Responses to Plaintiffs' October 16, 2024
Complaint:

3. Nathan J. Ristuccia, counsel for the Plaintiffs, assents to this Motion and to the requested extensions.

4. A Scheduling Conference is scheduled for September 26, 2024. Granting this Motion will not result in the continuance of that Conference, or any other hearing, conference or trial.

5. No memorandum of law is submitted as the authority is cited herein.

WHEREFORE, for the reasons set forth above, Defendant Jennifer L. Deshaies respectfully request this Honorable Court to:

- A. Grant this Motion;
- B. Extend the deadline for Defendants to respond to Plaintiffs' Motion for Preliminary Injunction to October 10, 2024;
- C. Extend the deadline for Defendants to respond to Plaintiffs' Complaint to October 16, 2024; and
- D. Grant such other relief as may be just and proper.

Respectfully submitted,

JENNIFER L. DESHAIES

By her attorneys,

Dated: September 19, 2024

By: /s/ Peter G. Callaghan

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CERTIFICATE OF SERVICE

I hereby certify this 19th day of September 2024 copies of the within document have been served on all parties of record electronically via ECF.

/s/ Peter G. Callaghan

Peter G. Callaghan